

144960



U.S. Department  
of Transportation

**National Highway  
Traffic Safety  
Administration**

# Memorandum

{ NHTSA-2001-9628-34  
{ NHTSA-2001-9630-33

Subject:

Request to Place Comments in the Dockets  
Regarding Decisions for 2001 Ferrari  
360 and 550 Passenger Cars

Date: DEC 10 2001

From:

*Coleman Sachs*  
Coleman Sachs  
Attorney

Reply to  
Attn. of:

To:

Docket Management

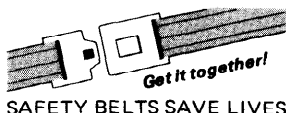
Please place the attached documents regarding whether  
nonconforming 2001 Ferrari 360 and 550 passenger cars are  
eligible for importation, as requested in Petition Nos. 484  
and 485, in both Docket Nos. NHTSA-2001-9628 and NHTSA-2001-  
9630.

Attachments

#

01 DEC 11 07:16:05

U.S. DEPARTMENT OF TRANSPORTATION



SAFETY BELTS SAVE LIVES

OCT 17 2001

Attachment 1

Jonathan Weisheit, President  
J. K. Technologies, L.L.C.  
3500 Sweet Air Street  
Baltimore, MD 21211

RE: Confidentiality Determination/Comments to Docket Nos. NHTSA-2001-9628/9630

Dear Mr. Weisheit:

This is in response to your letters dated October 3 and October 5, 2001, in which you request confidential treatment for information contained in your comments dated October 4, 2001, to the Petitions in the above referenced Dockets, enclosed with your submission. Specifically, you request confidential treatment for "data, photographs, drawings, Inter-company parts lists and engineering drawings along with the calculations supporting these submissions." You request confidential treatment for this information for a period of eight (8) years.


You assert that J. K. Technologies, L.L.C. has internally developed this information through "extensive and expensive testing" and design, and that its release "would result in substantial competitive harm to our organization as it would give our competitors a 'recipe' for the modification necessary to bring the 360 and 550 [Ferrari] models into compliance with all of the FMVSS [Federal Motor Vehicle Safety Standard]." You assert also that the Office of Chief Counsel (OCC) has previously granted confidential treatment for "similar compilations" of parts lists for Ferrari and that "Release of our data with [its] supporting engineering and drawings would literally be providing a blueprint and not just a recipe." In addition, you assert that this information "constitutes a major part of the intellectual and engineering property of the company as a whole" and that its release would allow "direct and indirect competitors in the industry [to] have a virtual blueprint of the engineering required to bring the vehicles into conformity with FMVSS without having to develop any systems of their own." Finally, you assert that "This compilation of information in total, has not been disclosed or otherwise made available to any other person, company or organization other than the submitter."

I have reviewed your submission, including the materials that you claim are entitled to confidential treatment and the arguments that you assert in support of your claim. While I have not reached a conclusion regarding each individual argument that you assert, I have

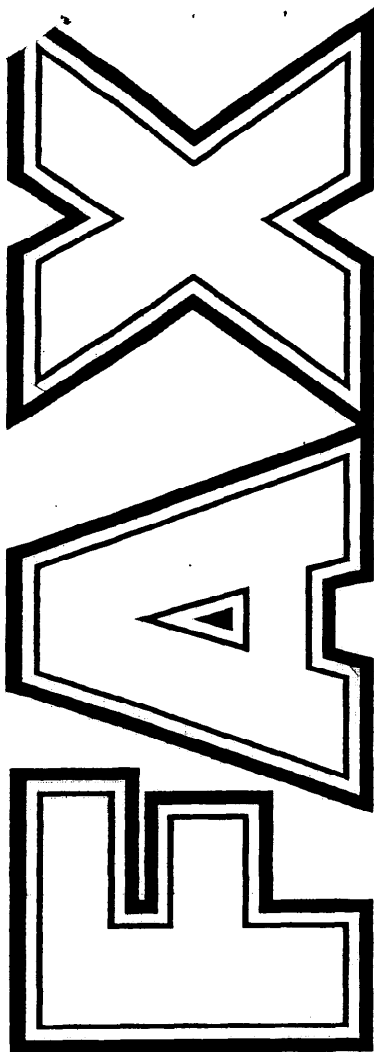
concluded based upon your submission as a whole that the materials submitted were provided voluntarily and are not customarily disclosed to the public. See Critical Mass Energy Project v. NRC, 975 F.2d 871, 879 (D.C. Cir. 1992). Therefore, I have decided to grant confidential treatment to these materials under Exemption 4 of the Freedom of Information Act, 5 U.S.C. § 552(b)(4). The information will be protected for the period of time you request (until October 3, 2009).

This grant of confidential treatment is subject to certain conditions. The information that has been granted confidential treatment may be disclosed under 49 CFR § 512.8, based upon newly discovered or changed facts, and you must inform the agency of any changed circumstances which may affect the protection of the information (49 CFR § 512.4(i)). Prior to the release of information under 49 CFR § 512.8, you would be notified in accordance with the procedures established by our regulations.

Sincerely,

  
Heidi L. Coleman  
Assistant Chief Counsel  
for General Law

NCC-30:wilson:61834:10/11/01:23665  
NCC-30:sub/chron  
NSA-32.2:Entwistle (w/appendix)  
U:\ncc30\conf\misc01\JK Tech.23665.kvw.doc



**U.S. DEPARTMENT  
OF TRANSPORTATION**

**NATIONAL HIGHWAY  
TRAFFIC SAFETY  
ADMINISTRATION**

**OFFICE OF  
VEHICLE SAFETY  
COMPLIANCE**

Rm 6115, NSA-32  
400 7th St., SW  
Washington, DC 20590

**P R A N S M I T T A L**

**FAX NUMBER:** (202) 366-1024

Attachment 2

**DATE:** November 6, 2001

**FROM:** Luke Loy

**TELEPHONE NUMBER:** (202) 366- 5308

**TO:** Mr. David Wertheim

**Company:** Ferrari North America

**FAX NUMBER:** 201-541-0038

**MESSAGE:** Request for Additional Information regarding the Ferrari 360 Modena/Spyder and 550 Marinello/Barchetta.

In order to evaluate comments made by both J.K. Technologies, and Ferrari North America we request the following information.

1. The parts page printout for the airbag/knee bolster showing part numbers for the Ferrari 550.
2. Are the U.S. version 360 Modena/Spyder and the 550 Marinello-Barchetta equipped with airbag cut-off switches?
3. Regarding the fuel tanks for the Ferrari 360/Ferrari 550--What are the differences between European and U.S. fuel tanks? Are there size, shape, wall thickness differences? Are the fuel tanks structured differently, located differently, fabricated differently, different location of inlets and outlets on the tank? Are the fuel lines, vent lines located differently around the tanks? Please provide an exploded view drawing of the general area around each fuel tank, for both the 360 and 550.
4. The roof structure of the 550 Coupe is different from the U.S. version to the European version. What is the method of fabrication of the roof structure?
5. Identify differences in the rear frame assembly between the U.S. and non-U.S. version vehicle for both the 360 and the 550 vehicles.

Please provide response by November 13, 2001, phone me if you have additional questions.

Luke Loy

Import Certification and Compliance Engineer

Attachment 3

**MAYER, BROWN & PLATT**

1909 K STREET, N.W.

WASHINGTON, D.C. 20006-1101

ADAM C. SLOANE  
DIRECT DIAL (202) 263-3269  
DIRECT FAX (202) 263-5269  
asloane@mayerbrown.com

MAIN TELEPHONE  
(202) 263-3000  
MAIN FAX  
(202) 263-3300

November 14, 2001

By Facsimile and UPS

Luke Loy  
Import Certification and Compliance Engineer  
National Highway Traffic Safety Administration  
400 Seventh Street, S.W., Rm. 6115, NSA-32  
Washington, D.C. 20590

Re: Docket Nos. NHTSA-2001-9628 and NHTSA-2001-9630 – Request for  
Additional Information Regarding the Ferrari 360 Modena/Spyder and 550  
Maranello/Barchetta

Dear Mr. Loy:

Ferrari North America, Inc. ("FNA"), through its undersigned counsel, hereby responds to your request (dated Nov. 6, 2001) for additional information regarding the Ferrari 360 Modena/Spyder and 550 Maranello/Barchetta in connection with above-referenced dockets. Your request contains five separately numbered items. For your convenience, we will set forth each numbered request in bold-face type together with FNA's response to each.

**1. The parts page printout for the airbag/knee bolter showing part numbers for the Ferrari 550.**

The requested printout is attached hereto as Attachment 1.

**2. Are the U.S. version 360 Modena/Spyder and the 550 Maranello-Barchetta equipped with airbag cut-off switches?**

No.

**3. Regarding the fuel tanks for the Ferrari 360/Ferrari 550 – What are the differences between European and U.S. fuel tanks? Are there size, shape, wall thickness differences? Are the fuel tanks structured differently, located differently, fabricated**

CHARLOTTE CHICAGO COLOGNE FRANKFURT HOUSTON LONDON  
LOS ANGELES NEW YORK PALO ALTO PARIS WASHINGTON  
INDEPENDENT MEXICO CITY CORRESPONDENT: JAUREGUI, NAVARRETE, MADER Y ROJAS

**MAYER, BROWN & PLATT**

Luke Loy  
November 14, 2001  
Page 2

**differently, different location of inlet and outlets on the tank? Are the fuel lines, vent lines located differently around the tanks? Please provide an exploded view drawing of the general area around each fuel tank, for both the 360 and 550.**

The requested drawings are attached hereto as Attachment 2. Although the fuel tanks are fabricated using the same materials and methods, and are similarly located, there are significant differences between the U.S. and non-U.S. versions of the fuel tanks:

- The U.S. 360s' left side fuel tank has a fuel filler neck opening that is different in diameter from the opening on the non-U.S. versions.
- Unlike the non-U.S. versions, the U.S. 360s' right side fuel tank has a fuel pressure sensor mounted in the top of the tank.
- The shape of the U.S. 550s' fuel tank is different from the shape of the non-U.S. version. This is attributable to the fitting of the vapor separator and the additional openings for the various lines.
- The U.S. 550s' fuel tank is fitted with a temperature sensor that is not present on the non-U.S. versions.
- There are volume (capacity) differences between the U.S. and non-U.S. versions of the 360s and 550s. These volume differences are attributable to the different components of the tanks, and, in the case of the 550, to the difference in shape.

The differences identified above are reflected in Attachment 2, which includes pages from the parts catalogues for the 360s and 550s. In addition, the attachment shows the different lines and hoses for the fuel tank system. It should be noted that the 550 parts catalogue includes a page for the U.S. versions and a different page for the non-U.S. versions. The blueprints that display the differences between the U.S. and non-U.S. versions are available from the factory and will be supplied to the agency upon request.

**4. The roof structure of the 550 Coupe is different from the U.S. version to the European version. What is the method of fabrication of the roof structure?**

Both the U.S. and European versions of the roof structure of the 550 Coupe are welded and riveted. However, as noted in Erika Z. Jones' letter to George Entwistle, dated September 7, 2001, the roof frame of the U.S. version of the Maranello is specially reinforced around the windshield to comply with FMVSS 216. Thus, although there is no difference between the U.S. and non-U.S. Maranello with respect to *how* the roof structure is affixed to the vehicle, the part itself differs.

**MAYER, BROWN & PLATT**

Luke Loy  
November 14, 2001  
Page 3

**5. Identify differences in the rear frame assembly between the U.S. and non-U.S. version vehicle for both the 360 and the 550 vehicles.**

Ferrari SpA has today informed us that, contrary to our statements in our letter to Mr. George Entwistle, dated September 7, 2001, the openings for the mounting of components on the rear frames of the U.S. and non-U.S. versions of the 360s and 550s are identical. However, as also noted in that letter, the U.S. versions of the 360s and 550s are fitted with a child seat tether anchorage. The non-U.S. and non-Canadian versions of the 360s and 550s do not have such an anchorage affixed to their rear frames. Moreover, for compliance with U.S. regulations, the U.S. versions of the 360s have additional equipment and components (for the fuel evaporative system, the secondary air injection system, and the fuel recirculation system) mounted on the rear frame assembly. Compliance testing under FMVSS Nos. 208 and 301, and other relevant safety standards, for the 360s and 550s has been conducted with rear frames that have these additional components and equipment, and it is not possible to conclude with assurance that the non-U.S. 360s and 550s that lack them would perform like the U.S. versions in crash tests and other tests.

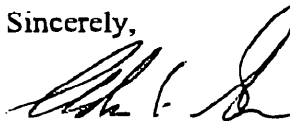
In light of this information, we assume that we need not provide exploded view drawings of the rear frames of the U.S. and non-U.S. versions of the 360s and 550s.

\* \* \*

Because the information in this letter and the attachments hereto is publicly available, FNA will not be filing a request for confidential treatment with the Office of Chief Counsel, and, accordingly, will not object if the letter and attachments are placed in the public docket in their entirety.

We hope that this information is responsive to your request and will assist the agency in making its determination with respect to the petitions at issue in these dockets. If you need further information or have any further questions, please don't hesitate to contact Mr. Wertheim by fax ((202) 541-0038), phone ((201) 816-2713) or e-mail ([dwertheim@ferrarius.com](mailto:dwertheim@ferrarius.com)).

Sincerely,



Adam C. Sloane

cc: David Wertheim

Atts.

## ATTACHMENT 1

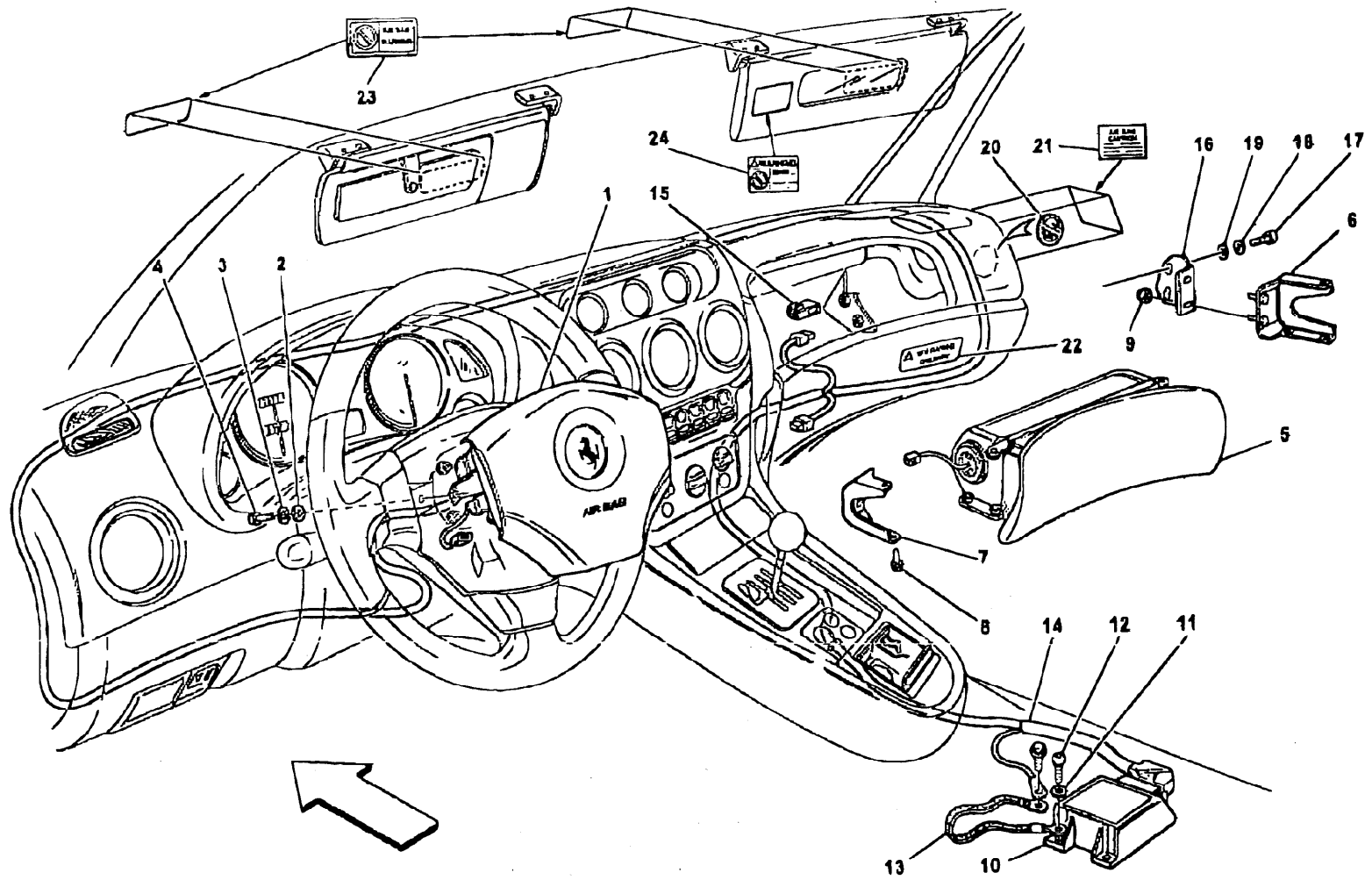


100-107070-107071-107072-107073-107074-107075-107076-107077-107078-107079-107080-107081-107082-107083-107084-107085-107086-107087-107088-107089-107090-107091-107092-107093-107094-107095-107096-107097-107098-107099-107100-107101-107102-107103-107104-107105-107106-107107-107108-107109-107110-107111-107112-107113-107114-107115-107116-107117-107118-107119-107120-107121-107122-107123-107124-107125-107126-107127-107128-107129-107130-107131-107132-107133-107134-107135-107136-107137-107138-107139-107140-107141-107142-107143-107144-107145-107146-107147-107148-107149-107150-107151-107152-107153-107154-107155-107156-107157-107158-107159-107160-107161-107162-107163-107164-107165-107166-107167-107168-107169-107170-107171-107172-107173-107174-107175-107176-107177-107178-107179-107180-107181-107182-107183-107184-107185-107186-107187-107188-107189-107190-107191-107192-107193-107194-107195-107196-107197-107198-107199-107200-107201-107202-107203-107204-107205-107206-107207-107208-107209-107210-107211-107212-107213-107214-107215-107216-107217-107218-107219-107220-107221-107222-107223-107224-107225-107226-107227-107228-107229-107230-107231-107232-107233-107234-107235-107236-107237-107238-107239-107240-107241-107242-107243-107244-107245-107246-107247-107248-107249-107250-107251-107252-107253-107254-107255-107256-107257-107258-107259-107260-107261-107262-107263-107264-107265-107266-107267-107268-107269-107270-107271-107272-107273-107274-107275-107276-107277-107278-107279-107280-107281-107282-107283-107284-107285-107286-107287-107288-107289-107290-107291-107292-107293-107294-107295-107296-107297-107298-107299-107300-107301-107302-107303-107304-107305-107306-107307-107308-107309-107310-107311-107312-107313-107314-107315-107316-107317-107318-107319-107320-107321-107322-107323-107324-107325-107326-107327-107328-107329-107330-107331-107332-107333-107334-107335-107336-107337-107338-107339-107340-107341-107342-107343-107344-107345-107346-107347-107348-107349-107350-107351-107352-107353-107354-107355-107356-107357-107358-107359-107360-107361-107362-107363-107364-107365-107366-107367-107368-107369-107370-107371-107372-107373-107374-107375-107376-107377-107378-107379-107380-107381-107382-107383-107384-107385-107386-107387-107388-107389-107390-107391-107392-107393-107394-107395-107396-107397-107398-107399-107400-107401-107402-107403-107404-107405-107406-107407-107408-107409-107410-107411-107412-107413-107414-107415-107416-107417-107418-107419-107420-107421-107422-107423-107424-107425-107426-107427-107428-107429-107430-107431-107432-107433-107434-107435-107436-107437-107438-107439-107440-107441-107442-107443-107444-107445-107446-107447-107448-107449-107450-107451-107452-107453-107454-107455-107456-107457-107458-107459-107460-107461-107462-107463-107464-107465-107466-107467-107468-107469-107470-107471-107472-107473-107474-107475-107476-107477-107478-107479-107480-107481-107482-107483-107484-107485-107486-107487-107488-107489-107490-107491-107492-107493-107494-107495-107496-107497-107498-107499-107500-107501-107502-107503-107504-107505-107506-107507-107508-107509-107510-107511-107512-107513-107514-107515-107516-107517-107518-107519-107520-107521-107522-107523-107524-107525-107526-107527-107528-107529-107530-107531-107532-107533-107534-107535-107536-107537-107538-107539-107540-107541-107542-107543-107544-107545-107546-107547-107548-107549-107550-107551-107552-107553-107554-107555-107556-107557-107558-107559-107560-107561-107562-107563-107564-107565-107566-107567-107568-107569-107570-107571-107572-107573-107574-107575-107576-107577-107578-107579-107580-107581-107582-107583-107584-107585-107586-107587-107588-107589-107590-107591-107592-107593-107594-107595-107596-107597-107598-107599-107600-107601-107602-107603-107604-107605-107606-107607-107608-107609-107610-107611-107612-107613-107614-107615-107616-107617-107618-107619-107620-107621-107622-107623-107624-107625-107626-107627-107628-107629-107630-107631-107632-107633-107634-107635-107636-107637-107638-107639-107640-107641-107642-107643-107644-107645-107646-107647-107648-107649-107650-107651-107652-107653-10

12/08/01

23	85423700	1	-Not for USA, AUS and CDN- AIR-BAG PRESENCE PLATE
23	64541600	1	-Valid for USA and AUS- AIR-BAG PRESENCE PLATE
24	65423800	1	-Valid for CDN- AIR-BAG USING AUTO-ADHESIVE PLATE
24	64541500	1	-Valid for USA and AUS- AIR-BAG USING AUTO-ADHESIVE PLATE
			-Valid for CDN-

See "INNER TRIMS CAR CODES" table for codes of parts covered in leather or moquette.

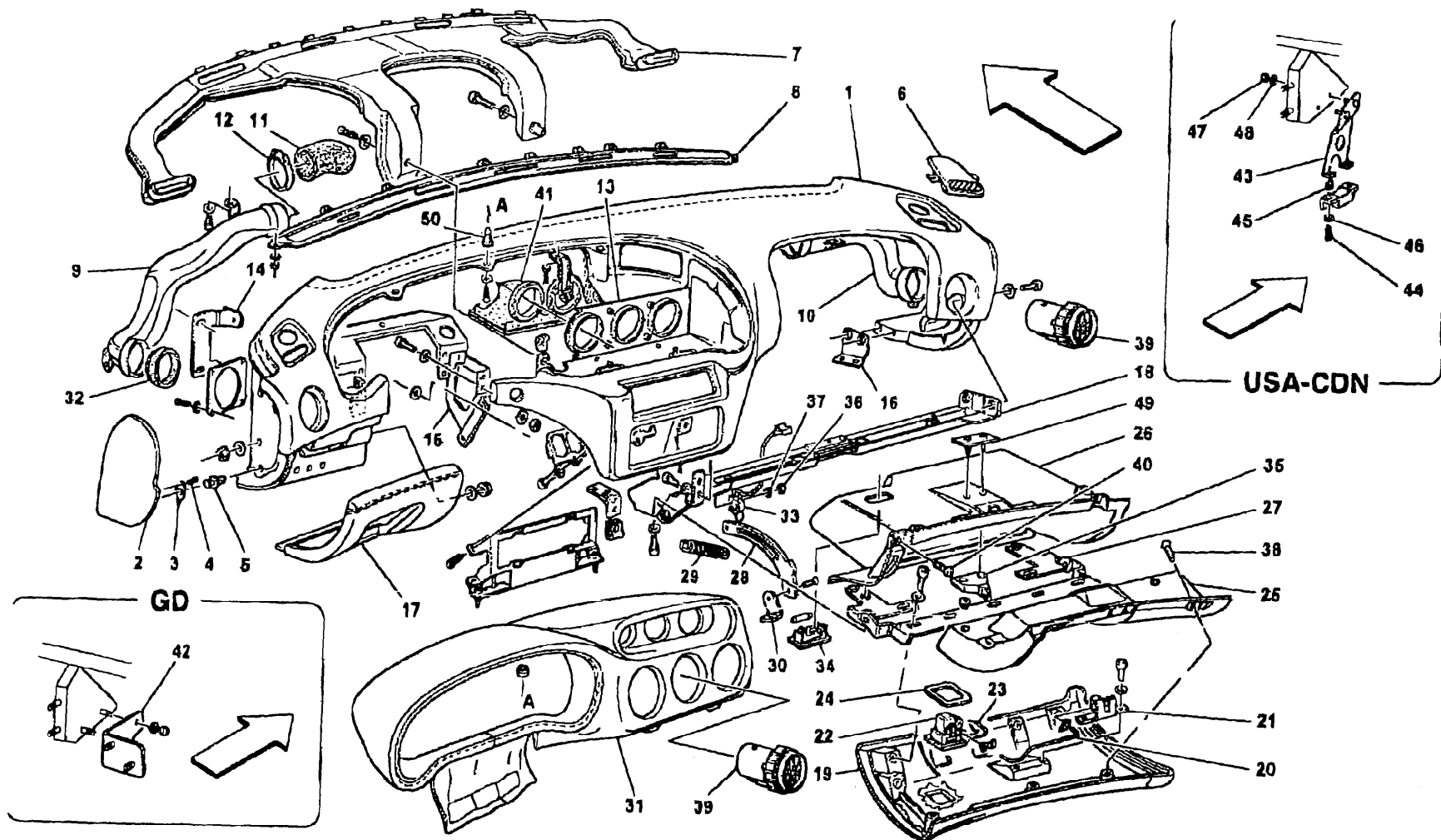


550 Meranello - 124 - Instruments panel

1	647583..	1	COVERED DASHBOARD WITH INSTRUMENTS -Not for GD-
-	651138..	1	COVERED DASHBOARD WITH INSTRUMENTS -Valid for GD-
2	647665..	1	L.H. LATERAL COVER
-	647668..	1	R.H. LATERAL COVER
3	64712800	4	PLATE
4	15914877	8	SCREW
5	14188181	4	RETAINER
8	63204200	1	R.H. PLATE
-	63204300	1	L.H. PLATE
7	64707400	1	AIR DUCTING -Not for GD-
-	65024100	1	AIR DUCTING -Valid for GD-
8	63202100	1	LOWER ENCLOSURE
9	64706200	1	L.H. AIR DUCTING -Not for GD-
-	65212200	1	L.H. AIR DUCTING -Valid for GD-
10	64706300	1	R.H. AIR DUCTING -Not for GD-
-	65212100	1	R.H. AIR DUCTING -Valid for GD-
11	64758200	1	L.H. SLEEVE -Not for GD-
-	65217300	1	L.H. SLEEVE -Valid for GD-
-	64758100	1	R.H. SLEEVE -Not for GD-
-	65216600	1	R.H. SLEEVE -Valid for GD-
12	13000890	2	SCREW COLLAR
13	64719500	1	AIR DUCT CONNECTION
14	64701500	1	DASHBOARD R.H. LATERAL FIXING BRACKET
-	64701700	1	DASHBOARD L.H. LATERAL FIXING BRACKET
15	64720000	1	BRACKET -Not for GD-
-	65049700	1	BRACKET -Valid for GD-
16	64703200	1	R.H. BRACKET -Not for GD-
-	65024700	1	R.H. BRACKET -Valid for GD-
17	647591..	1	L.H. LOWER COVER -Not for GD-
-	650250..	1	R.H. LOWER COVER -Valid for GD-
18	64588000	1	L.H. SIDE BRACKET -Not for GD-
-	65049400	1	R.H. SIDE BRACKET -Valid for GD-
19	645882..	1	GLOVE BOX SHUTTER -Not for GD-
-	650498..	1	GLOVE BOX SHUTTER -Valid for GD-
20	64653900	1	TIE ROD -Not for GD-
-	65166800	1	TIE ROD -Valid for GD-

21	63768800	1	GLOVE BOX LOCK
22	64926500	1	PUSH BUTTON
23	63769000	1	FORK
24	63768900	1	PLATE
25	64653700	1	DOOR FRAME
-	65024900	1	-Not for GD- DOOR FRAME -Valid for GD-
26	64767600	1	DASHBOARD DRAWER
-	65103900	1	-Not for GD- DASHBOARD DRAWER -Valid for GD-
27	64653200	1	BOX HINGE
-	65026800	1	-Not for GD- BOX HINGE -Valid for GD-
28	63765700	1	LEVER
29	63876700	1	DOOR SPRING
30	64580800	1	BRACKET
-	65024600	1	-Not for GD- BRACKET -Valid for GD-
31	647596..	1	COVERED DASH BOARD
-	647595..	1	-Not for GD- -Not as spare part now- -Replaced by 647595..- COVERED DASH BOARD -Not for GD-
-	651043..	1	COVERED DASH BOARD -Valid for GD-
32	62188300	2	GASKET
33	173939	1	MICRO-SWITCH
34	139517	1	ROOF LIGHT
35	65258900	1	STRIKER
36	61524300	2	NUT
37	61524200	4	WASHER
38	65212000	3	SCREW
39	63352600	5	AIR OPENING
40	65381300	2	PIN
41	64587400	1	UNION FROM EVAPORATOR UNIT TO AIR OPENING
-	65024300	1	-Not for GD- UNION FROM EVAPORATOR UNIT TO AIR OPENING -Valid for GD-
42	171800	1	INTERMEDIATE BRACKET -Valid for GD-
43	168961	1	OBDII CONNECTOR FIXING BRACKET -Valid for USA and CDN-
44	15688170	2	SCREW -Valid for USA and CDN-
45	14202580	2	BLOCK -Valid for USA and CDN-
46	10519224	2	WASHER -Valid for USA and CDN-
47	113547	2	NUT -Valid for USA and CDN-
48	12637824	2	WASHER -Valid for USA and CDN-
49	63765300	1	STRIKER FIXING PLATE
50	65879900	3	PIN

See "INNER TRIMS CAR CODES" table for codes of parts covered in leather or moquette.



NOV 14 '01 16:11 FR MYTER BRUN FL11

202203000 10 50010244

P.11/21

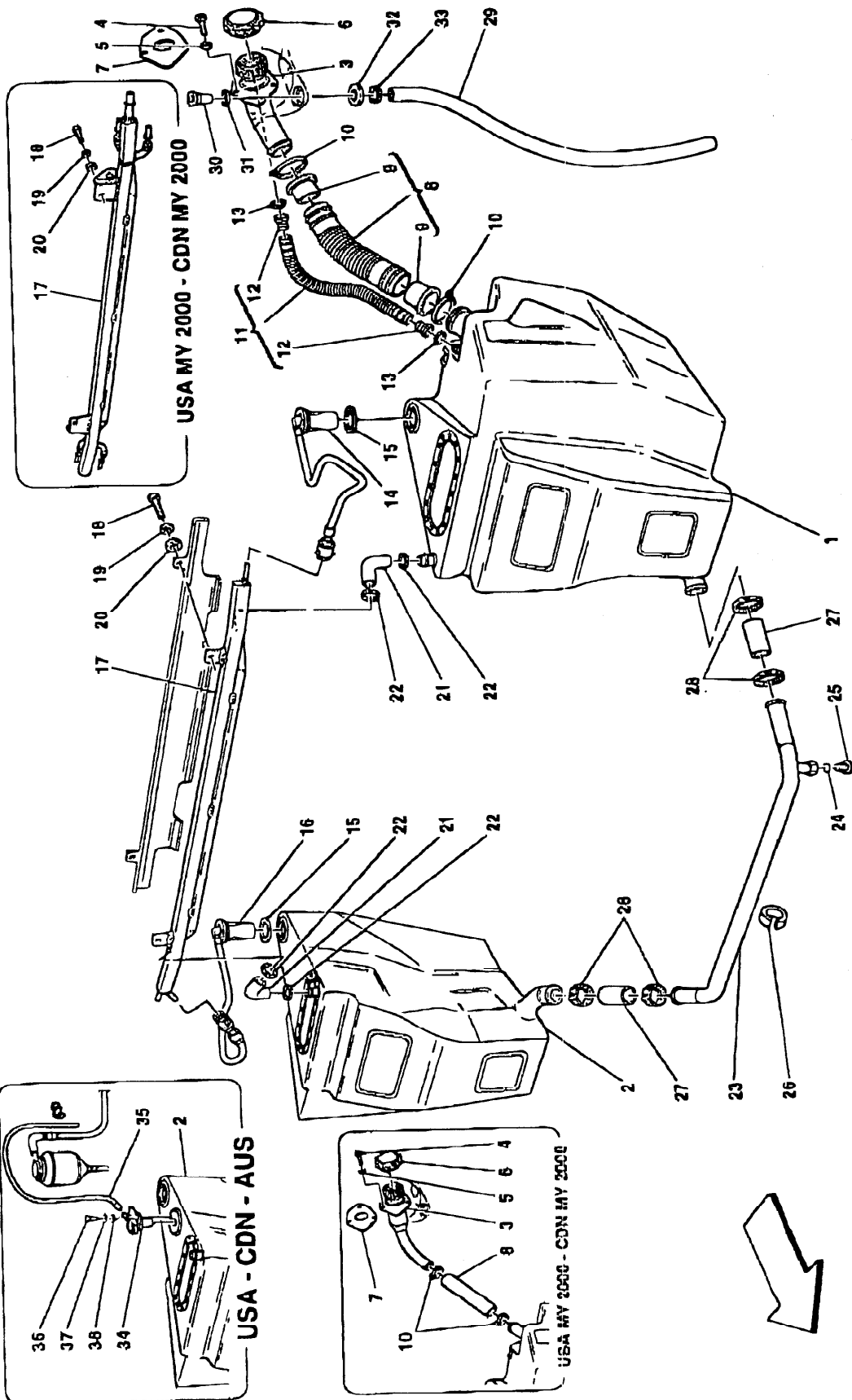
## ATTACHMENT 2

360 Modena - 11 - FUEL TANKS AND UNION

1	175418	1	L.H. FUEL TANK -Not as spare part replaced by 181270-
1	181270	1	L.H. FUEL TANK -Replaces 175418- -Not for USA MY 2000 and CDN MY 2000-
1	179524	1	L.H. FUEL TANK -Valid for USA MY 2000 and CDN MY 2000-
2	175419	1	R.H. FUEL TANK -Not for USA, CDN and AUS- -Not as spare part replaced by 181326-
2	181326	1	R.H. FUEL TANK -Not for USA, CDN and AUS- -Replaces 175419-
2	181338	1	R.H. FUEL TANK -Valid for USA, CDN and AUS-
3	177638	1	UNION -Valid for catalyzed cars- -Not for USA, CDN and AUS-
3	180959	1	UNION -Valid for not catalyzed cars- -Not for USA, CDN and AUS-
3	185264	1	UNION -Valid for USA, CDN and AUS-
4	64685900	3	SCREW
5	12601274	3	WASHER
6	177572	1	COMPLETE PLUG -Not as spare part replaced by 180118-
6	180118	1	COMPLETE PLUG -Replaces 177572-
7	172899	1	GASKET
8	177640	1	UNION-TANK CONNECTING PIPE -Not for USA, CDN and AUS-
8	178665	1	UNION-TANK CONNECTING PIPE -Valid for USA, CDN and AUS-
9	141033	2	GASKET -Not for USA, CDN and AUS-
10	165398	2	SCREW COLLAR -Not for USA, CDN and AUS-
10	180957	2	SCREW COLLAR -Valid for USA, CDN and AUS-
11	174101	1	VENT PIPE FROM TANK TO UNION -Not for USA, CDN and AUS-
12	142105	2	GASKET -Not for USA, CDN and AUS-
13	164015	2	SCREW COLLAR -Not for USA, CDN and AUS-
14	180394	1	L.H. VALVE WITH PIPE -Not for USA MY 2000 and CDN MY 2000-
14	180608	1	L.H. VALVE WITH PIPE -Valid for USA MY 2000 and CDN MY 2000-
15	169938	2	GASKET
16	180382	1	R.H. VALVE WITH PIPE -Not for USA MY 2000 and CDN MY 2000-
16	180608	1	R.H. VALVE WITH PIPE -Valid for USA MY 2000 and CDN MY 2000-
17	178511	1	DISAREATOR -Not for USA MY 2000 and CDN MY 2000-
17	182964	1	DISAREATOR -Valid for USA MY 2000 and CDN MY 2000-
18	10902411	2	SCREW
19	127494	2	WASHER
20	10523424	2	WASHER
21	166602	2	SLEEVE
22	127494	4	SCREW COLLAR



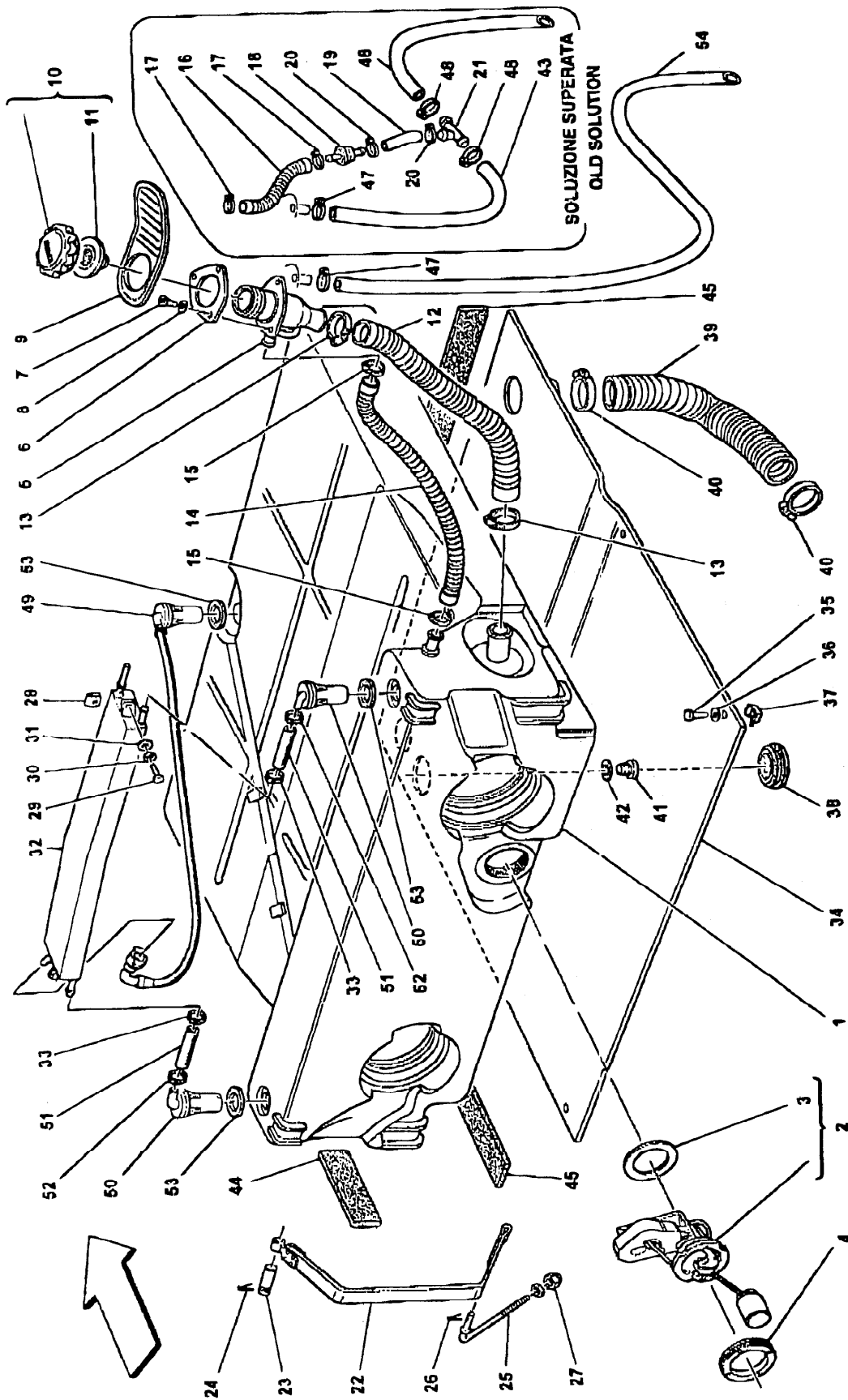




550 Maranello - 12 - Fuel tank -Not for USA M.Y. 99, USA M.Y. 2000, CDN M.Y. 99 and CDN M.Y. 2000-

1	165129	1	FUEL TANK
2	168238	1	COMPLETE FUEL LEVEL INDICATOR CONTROL
3	154802	1	GASKET
4	121435	1	RING NUT
5	172953	1	FILLER -Valid till Ass. Nr. 24856- -Not for not catalyzed cars-
-	171278	1	FILLER -Valid from Ass. N° 24857- -Not for not catalyzed cars-
-	173482	1	FILLER -Valid for not catalyzed cars-
6	174095	1	GASKET
7	62926700	3	SCREW
8	12601274	3	WASHER
9	62843200	1	RUBBER PROTECTION
10	142790	1	PLUG -Valid till Ass. Nr. 24856- -Not as spare part now- -Replaced by 175708-
-	175708	1	PLUG
-	171324	1	PLUG -Valid from Ass. Nr. 24857- -Not as spare part now- -Replaced by 180321-
-	180321	1	PLUG
11	142792	1	GASKET -Valid till Ass. Nr. 24856- -Not as spare part now- -Replaced by 175708-
-	175709	1	GASKET
-	170822	1	GASKET -Valid from Ass. Nr. 24857- -Not as spare part now- -With complete plug 180321-
12	167131	1	FILLER-TANK CONNECTING PIPE
13	170127	2	SCREW COLLAR
14	165132	1	VENT PIPE FROM TANK TO FILLER
15	164015	2	SCREW COLLAR
16	170156	1	PIPE FROM FILLER TO VALVE
17	13431570	2	SCREW COLLAR
18	169840	1	2-WAY VALVE
19	170546	1	RUBBER PIPE
20	13431870	2	SCREW COLLAR
21	170615	1	3-WAY UNION
22	172340	2	FUEL TANK FASTENER
23	103447	2	PIN
24	10786440	4	SPLIT PIN
25	127529	2	THREADED TIE ROD
26	10786440	2	SPLIT PIN
27	104030	2	NUT
28	62766300	2	CLIP
29	10902224	2	SCREW
30	127494	2	WASHER
31	10519424	2	WASHER
32	169583	1	DISAREATOR -Valid till car Ass. Nr. 30286- -Not for USA M.Y. 99 and CDN M.Y. 99-
-	178858	1	DISAREATOR -Valid from car Ass. Nr. 30267- -Valid for USA M.Y. 99 and CDN M.Y. 99-
33	13434670	2	SCREW COLLAR
34	65083800	1	UNDER TANK SHIELD
35	10607424	4	SCREW

36	12643724	4	WASHER
37	60659400	4	NUT WITH GAGE
38	64783600	1	RUBBER PLUG
39	65084500	2	AIR DELIVERY TUBE TO TANK
40	12173190	4	SCREW COLLAR
41	148045	1	THREADED PLUG
42	123622	1	O.R. GASKET
43	65197700	1	EXHAUST PLASTIC HOSE
44	157411	1	RUBBER THICKNESS
45	167025	3	RUBBER THICKNESS
46	161032	1	EXHAUST PLASTIC HOSE
47	13423671	1	ELASTIC COLLAR
48	161490	2	SCREW COLLAR
49	169837	1	PIPE WITH VALVE
50	169839	2	VALVE
51	116762	2	RUBBER HOSE
52	13434670	2	SCREW COLLAR
53	169838	3	GASKET
54	178851	1	RUBBER HOSE



NOV 14 10 10 AM '61

44701000 10 0000000000

TABLE 7

29	10902124	2	SCREW -Valid for USA M.Y. 2000 and CDN M.Y. 2000-
30	127494	2	WASHER -Valid for USA M.Y. 99 and CDN M.Y. 99-
30	12639724	2	WASHER -Valid for USA M.Y. 2000 and CDN M.Y. 2000-
31	10519424	2	WASHER -Valid for USA M.Y. 99 and CDN M.Y. 99-
31	127494	2	WASHER -Valid for USA M.Y. 2000 and CDN M.Y. 2000-
32	178866	1	DISAREATOR -Valid for USA M.Y. 99 and CDN M.Y. 99-
32	181931	1	DISAREATOR -Valid for USA M.Y. 2000 and CDN M.Y. 2000-
33	169937	1	VALVE COMPLETED WITH PIPING -Valid for USA M.Y. 99 and CDN M.Y. 99-
33	180469	1	VALVE COMPLETED WITH PIPING -Valid for USA M.Y. 2000 and CDN M.Y. 2000-
34	65083800	1	UNDER TANK SHIELD
35	10902424	4	SCREW
36	12643724	4	WASHER
37	60659100	4	NUT WITH CAGE
38	64783600	1	RUBBER PLUG
39	65084500	2	AIR DELIVERY TUBE TO TANK
40	13000790	4	SCREW COLLAR
41	148045	1	THREADED PLUG
42	123822	1	O.R. GASKET
43	169938	3	GASKET
44	62943200	1	RUBBER PROTECTION
45	14622387	1	PLUG -Valid for USA M.Y. 2000 and CDN M.Y. 2000-
46	156682	2	LOWER THICKNESS
47	171163	1	PROTECTION SHEATH -Valid for USA M.Y. 2000 and CDN M.Y. 2000-
48	183850	1	BRACKET -Valid for USA M.Y. 2000 and CDN M.Y. 2000-
49	167925	1	FRONT THICKNESS
50	183585	2	REAR THICKNESS -Valid for USA M.Y. 2000 and CDN M.Y. 2000-
51	157411	2	REAR THICKNESS -Valid for USA M.Y. 99 and CDN M.Y. 99-
51	183387	2	REAR THICKNESS -Valid for USA M.Y. 2000 and CDN M.Y. 2000-

